

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

CENTRO PRESENTE, a membership organization;
HAITIAN-AMERICANS UNITED, INC., a membership
organization; JUAN CARLOS VIDAL; ANNE CHRISTINE
NICOLAS; CHRIS JEAN BAPTISTE; MERCEDES
MATA; CAROLINA MATA; WILL ARIAS; JUAN
AMAYA; MARIA GUERRA; JOSUE DORFEUILLE;
NATACHA DORFEUILLE; YESY PATRICIA
CARBAJAL; JUAN GUERRERO; JAIME YANES; and
JOSE OMAR RODRIGUEZ VARELA,

Plaintiffs,

v.

DONALD J. TRUMP, President of the United States in his
official capacity; UNITED STATES DEPARTMENT OF
HOMELAND SECURITY; KIRSTJEN NIELSEN, Secretary
of the Department of Homeland Security in her official
capacity; and ELAINE COSTANZO DUKE, Deputy
Secretary of the Department of Homeland Security in her
official capacity,

Defendants.

No. 1:18-cv-10340-DJC

**SUPPLEMENTAL JOINT STATEMENT OF THE PARTIES
PURSUANT TO LOCAL RULE 16.1(D)**

Pursuant to the Court's instructions during the September 7, 2018 Scheduling Conference
(*see* ECF 54), the parties in this action submit the following supplemental joint statement.

I. Joint Proposed Schedule

A. Initial Disclosures

The parties will serve initial disclosures on or before September 21, 2018.

B. Joinder of Additional Parties and Amendments to Pleadings

Except for good cause shown, no motions seeking leave to add new parties or to amend the pleadings to assert new claims or defenses may be filed after October 10, 2018.

C. Fact Discovery

Fact discovery will be completed by March 8, 2019. No written discovery shall be served after February 6, 2019.

II. Motions

A. Discovery Motions

Plaintiffs served their initial set of discovery requests on Defendants on September 18, 2018. Defendants are reviewing the requests, and the parties will meet and confer with respect to any objections. In the event that the parties are unable to resolve any disputed issues during the conferral process, the parties will contact the Court to seek guidance with respect to how such issues should be presented for resolution, and the timing of any such presentation.

B. Status Conference and Dispositive Motions

As discussed during the September 7, 2018 Scheduling Conference, Temporary Protected Status (“TPS”) for the three countries at issue in this action will expire on the following dates:

Haiti	July 22, 2019
El Salvador	September 9, 2019
Honduras	January 5, 2020

The parties expect to complete discovery sufficiently in advance of the earliest of these dates, July 22, 2019, in order to proceed with summary judgment motions, or, if necessary, for Plaintiffs to seek provisional relief to enjoin the effective date of the TPS terminations.

In accordance with the Court’s responses to the USDC Judicial Forum Survey, the parties respectfully request that the Court convene a status conference at or near the close of fact

discovery, and subject to the Court's availability, for the parties to propose a briefing schedule for subsequent dispositive motions.

Respectfully Submitted,

CENTRO PRESENTE, a membership organization, *et al.*,

By their attorneys,

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Date: September 21, 2018

CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants.

/s/ Kevin O'Keefe